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Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,
Plaintiff,
vs.
SONOS, INC.,
Defendant

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

GOOGLE'S ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED

1 **I. INTRODUCTION**

2 Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this
 3 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in
 4 connection with Google’s Motion to Bifurcate Validity from Willfulness and Damages for the Patent
 5 Showdown Trial (“Motion to Bifurcate”). Certain portions of the Motion to Bifurcate and
 6 documents filed in support thereof contain information that Sonos, Inc. (“Sonos”) may consider
 7 confidential pursuant to the Stipulated Protective Order (“Protective Order”) entered by this Court.
 8 Dkt. 94. Accordingly, Google seeks to file under seal the documents and information as listed
 9 below:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Bifurcate	Portions highlighted in blue	Sonos
Exhibit 1 to the Declaration of Jocelyn Ma in Support of Google’s Motion to Bifurcate (“Exhibit 1”)	Entire Document	Sonos

15 Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule
 16 79-5(f) when the document, or portions thereof, “has been designated as confidential by another
 17 party or non-party.” L.R. 79-5(f). Google has redacted the portions of the Motion to Bifurcate
 18 highlighted in blue and filed the entirety of Exhibit 1 under seal because information therein may
 19 be considered “CONFIDENTIAL” and/or “HIGHLY CONFIDENTIAL—ATTORNEYS’ EYES
 20 ONLY” under the Protective Order by Sonos.

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1 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above listed
2 documents accompany this Administrative Motion and redacted versions of the above listed
3 documents have been filed publicly. In accordance with Local Rule 79-5(c)(3), Google has also
4 filed a Proposed Order herewith.

DATED: August 24, 2022

**QUINN EMANUEL URQUHART & SULLIVAN,
LLP**

By: /s/ Charles K. Verhoeven

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that, on August 24, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system and email.

DATED: August 24, 2022

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven